

Archived: Friday, April 16, 2021 1:46:16 PM

From: Richard Sandza

Sent: Thu, 8 Apr 2021 18:25:21 +0000
Received: from DM6PR13CA0005.namprd13.prod.outlook.com (2603:10b6:5:bc::18) by
DM6PR19MB4041.namprd19.prod.outlook.com (2603:10b6:5:229::20) with Microsoft SMTP Server (version=TLS1_2,
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.4020.18; Thu, 8 Apr 2021 18:25:20 +0000
Received: from DM6NAM12FT020.eop

To: Haefele, Robert; Martin McMahon

Subject: EXTERNAL-Deposition of Wael Julaidin

Importance: Normal

Mr. Haefele,

In the interest of continuing dialog and cooperation, let me share with you the entire, unredacted, unedited text of an email I received from Mr. Julaidin's Saudi attorney.

Without waiving any privilege, here it is:

Dear Mr. Sandza;

I am hereby responding on behalf of Mr. Julaidan.

There is a growing concern and bewilderment vi-a-vis the intransigence the plaintiffs' Attorneys. When we propose a date, it seems they have a right to say that it does not suit them, but My client is denied the same right to put forth the dates he can make it to Jeddah for such a meeting.

My Client does not need to go into his personal life and detail all his predicaments in order to convince the plaintiffs' Attorneys. The dates proposed by my client remain available for them to take or leave.

As regards the time allotment, We insist on it being the minimum required by Law. Further, My client insists on having his translator to confirm the credibility of the plaintiffs' translator.

Mr. Julaidan was and still is very cooperative throughout the decade he suffered senselessly from this case. But he has decided he will not be pushed around nor be intimidated anymore.

Ask the honorable colleagues to take it or leave as they see fit.

Best Regards;

Bassim A. Alim

--
Richard Sandza, Esquire
Of Counsel
Martin F. McMahon And Associates, PLLC
1717 K Street NW
Washington, DC 20006
MartinMcMahonLaw.com
202-862-4341
FAX 202-776-0136

This electronic mail transmission may contain privileged, confidential and/or proprietary information intended only for the person(s) named. Any use, distribution, copying or disclosure to another person is strictly prohibited. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. **** **IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed therein.**

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney-client privileged and confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies—electronic, paper or otherwise—which you may have of this communication.